



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

November 26, 2002

Certified Mail No. 7099 3220 0009 1975 6803

Jim Warren
Mill Manager
Merritt Brothers Lumber Co.
P. O. Box 190
Athol, ID 83801

RE: AIRS Facility No. 055-00039 Merritt Brothers Lumber Co., Athol
Final Tier II Operating Permit and Permit to Construct to Public Comment

Dear Mr. Warren:

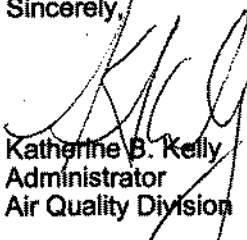
The Department of Environmental Quality (Department) is issuing Tier II Operating Permit and Permit to Construct No. 055-00039 for the Merritt Brothers Lumber Co. in Athol in accordance with *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400-470 and 58.01.01.200-228, respectively.

The enclosed permit is effective immediately and is based on the information contained in your permit application and the relevant comments received during the public comment period.

Tom Harmon of the Coeur d'Alene Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23, *Rules of Administrative Procedure Before the Board of Environmental Quality*. A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, prior to filing a petition for a contested case, the Department encourages you to contact Mike Simon at (208) 373-0502 to address any concerns you may have with the enclosed permit.

Sincerely,


Katherine B. Kelly
Administrator
Air Quality Division

cc: Tom Harmon, Coeur d'Alene Regional Office
Laurie Kral EPA - Region 10

November 26, 2002

**STATE OF IDAHO
DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PUBLIC COMMENTS
ON PROPOSED TIER II AIR QUALITY PERMIT AND PERMIT TO CONSTRUCT
FOR MERRITT BROTHERS LUMBER CO., ATHOL, IDAHO**

Introduction

As required by IDAPA 58.01.01.404.01 (*Rules for the Control of Air Pollution in Idaho*), the Idaho Department of Environmental Quality (DEQ) provided for public comment, including offering an opportunity for a hearing, a Tier II operating permit and permit to construct proposed for the Merritt Brothers Lumber Co. facility located in Athol, Idaho. Public comment packages, which included the application materials, and proposed permit and technical memorandum, were made available for public review at the DEQ's Coeur d'Alene Regional Office, and DEQ's State Office in Boise. A copy of the proposed permit and technical memorandum was also posted on DEQ's Web site. The public comment period was provided from September 26, 2002 through October 25, 2002, with no public hearing requested. Those comments regarding the air quality aspects of the draft permit are provided below with DEQ's response immediately following.

Public Comments and DEQ Responses

The following comments were received from Lorenzen Engineering on behalf of Merritt Brothers:

- Comment: On page 1 of the permit, several typographic errors were noted.

Response: The errors noted have been corrected.

- Comment: In Permit Condition 1.1; it was requested that phrases "which were constructed without a PTC" and "limit facility emissions to below major source status" be deleted.

Response: Permit condition 1.1 was re-written to better describe the relationship between the permit to construct and the Tier II operating permit requirements within the combination permit.

- Comment: In Condition 1.3, the baghouse is emissions control equipment for the planer shavings cyclone (Cyclone #4).

Response: The requested change has been made.

- Comment: In Permit condition 2.5, this should focus on observations of fugitive emissions, since visible emissions from point sources are addressed later in the permit.

Response: Permit condition 2.5 is a standard requirement regarding visible emissions. This requirement is intended only for point sources, i.e., stacks or vents. Fugitive emissions are covered in permit conditions 2.1, 2.2 and 2.3. Permit condition 5.5 in the proposed permit was removed because condition 2.5 covers the requirement for visible emissions observations on point sources such as cyclones.

- Comment: In Permit condition 2.8, the applicant requested confirmation that this applies only to reports submitted to DEQ and not records retained by the facility.

Response: This is correct, as stated in Condition 2.8.

- Comment: In Condition 2.8, is the standard for "responsible official" the same in this permit as for Tier I sources?

Response: Yes. Responsible official is a defined term in the *Rules for the Control of Air Pollution in Idaho*.

- Comment: Condition 3.5 should be deleted because the boiler was constructed before the effective date. (In a subsequent discussion, the applicant clarified that the boiler was built in November 1974 and moved to the site in February 2001).

Response: Under the above circumstances, 40 CFR 60, Subpart Dc is not applicable and Condition 3.5 has been deleted.

- Comment: In Condition 4.3 and in the tables in Sections 6 and 7, the PM₁₀ emissions for the drying kilns should be 8.55 T/yr.

Response: The requested changes have been made.

- Comment: In Condition 4.4, change "rolling annual summation" to "rolling 12-month summation."

Response: Permit condition has been updated to reflect that the throughput limit is based on a consecutive 12 month summation basis.

- Comment: In Condition 4.5, the facility does not process logs. A production limit in million board feet per year, board scale, is more appropriate.

Response: This condition and Condition 4.4 have been changed to be applicable to the kilns rather than the facility as a whole and expressed in the units recommended.

- Comment: In Conditions 5.1 and 5.2, clarifications to the description of equipment were recommended.

Response: The clarifications have been made.

- Comment: In Condition 5.3, the emission limits do not reflect the addition of the baghouse to Cyclone #4.

Response: The emission limits have been corrected and are also reflected in Sections 6 and 7.



**Air Quality
TIER II OPERATING PERMIT
And
PERMIT TO CONSTRUCT**

State of Idaho
Department of Environmental Quality

PERMIT NO.: 055-00039

AQCR: 62

CLASS: B

SIC: 2421

ZONE: 11

UTM COORDINATE (km): 521.6, 5310.2

1. PERMITTEE

Merritt Brothers Lumber Company – Remanufacturing Division

2. PROJECT

Tier II Operating Permit and Permit to Construct

3. MAILING ADDRESS

Post Office Box 190

CITY

Athol

STATE

ID

ZIP

83801

4. FACILITY CONTACT

Jim Warren

TITLE

Mill Manager

TELEPHONE

208-683-3321

5. RESPONSIBLE OFFICIAL

Jim Warren

TITLE

Mill Manager

TELEPHONE

208-683-3321

6. EXACT PLANT LOCATION

NE ¼ NW ¼ Section 16, Township 56 North, Range 3 West

COUNTY

Kootenai

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Dimensional Lumber Remanufacturing

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400-470, and IDAPA 58.01.01.200-228. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to the Tier II operating permit requirements are subject to the expiration date of this permit.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not yet begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.


KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: November 26, 2002

DATE EXPIRES: November 26, 2007

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LIST OF ACRONYMS, UNITS AND CHEMICAL NOMENCLATURE

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CO	carbon monoxide
DEQ	Idaho Department of Environmental Quality
dscf	dry standard cubic feet
EPA	United States Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAPs	Hazardous Air Pollutants
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMbf	million board feet
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter of 10 micrometers or less
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification Code
SO ₂	sulfur dioxide
TSP	total suspended particulates
T/yr	tons per year
μm	micrometers
UTM	Universal Transverse Mercator
VOC	volatile organic compound
yr	year

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. 055-00039

Permittee: Merritt Brothers Lumber Co.
Location: Athol, Idaho

Date Issued: November 26, 2002
Date Expires: November 26, 2007

1. PERMIT SCOPE**Purpose**

- 1.1 The permit to construct portion of this permit is to fulfill the new source review requirements for the construction of the natural gas-fired boiler, wood working equipment, and three lumber drying kilns at the facility. The purpose of the Tier II operating permit is to allow the operations of all air pollution emitting activities at the facility while protecting ambient air quality standards. This combination permit also incorporates an existing PTC which was issued in 1992.
- 1.2 This permit incorporates and replaces PTC No. 005-50039 issued October 22, 1992.

Regulated Sources

- 1.3 Table 1.1 below lists all sources of emissions that are regulated in this permit.

Table 1.1 REGULATED EMISSION SOURCES

Permit Section	Source Description	Emission Controls
3	Cleaver Brooks gas-fired boiler, Model L-59569, 29.3 million Btu/hr, constructed in 11/74 and installed at the facility in 2/01	None
4	Lumber drying kilns (3), rated at 90 MMbf/yr, installed 2/01 and 3/02	None
5	Cyclone No. 1 – Old planer cyclone Cyclone No. 2 – Rip saw relay cyclone Cyclone No. 3 – Rip saw cyclone Cyclone and Baghouse No. 4 – New planer cyclone and baghouse Cyclone No. 5 – Finger-jointer cyclone Cyclone No. 6 – Finger-jointer cyclone (pull through) Cyclone No. 7 – Remanufacturing chips cyclone chip bin target box	Cyclones and baghouse

Permit Requirements Summary

- 1.4 Table 1.2 below summarizes the action items required in this permit.

Table 1.2 REPORTING, RECORDKEEPING, and MONITORING SUMMARY

Requirement Description	Frequency	Permit Condition
Develop fugitive dust plan and submit for Department approval	Within 60 days of Permit issuance	2.2
Fugitive Complaint Log	As needed	2.3
Visible emission inspections of cyclones/baghouse/truck bins	Every calendar quarter	2.5
Maintaining on-site records	Five years	2.6
Monitor throughput of all kilns	Monthly and 12 month summation	4.5
Cyclone and baghouse daily hours of operation	Daily	5.5

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2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
 - Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
 - Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical.
 - Prompt removal of earth or other stored material from streets, where practical.
- [IDAPA 58.01.01.650-651, 5/1/94]
- 2.2 Within 60 days of the issuance date of this permit, the permittee shall submit to the Department a fugitive dust management plan for approval. At a minimum, the plan shall identify all sources at the facility which may emit fugitive dust, appropriate dust control methods for each source, and recordkeeping procedures for documenting the frequency and methods used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- [IDAPA 58.01.01.405.01, 07, 5/1/94]
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall, at a minimum, include the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- [IDAPA 58.01.01.405.02, 07, 5/1/94]

Visible Emissions

- 2.4 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.
- [IDAPA 58.01.01.625, 5/1/94]

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. 055-00039

Permittee: Merritt Brothers Lumber Co.
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- 2.5 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential point source. If any visible emissions are present from an point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance. The permittee shall maintain records of the results of each quarterly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test, and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.405.1, 5/1/94]

Monitoring and Recordkeeping

- 2.6 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Recording of monitoring information shall include, but not be limited to: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available to Department representatives upon request in either hard copy or electronic format.

[IDAPA 58.01.01.405.01, 5/1/94]

Excess Emissions

- 2.7 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 5/1/94]

Reports and Certifications

- 2.8 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814

[IDAPA 58.01.01.405.01, 5/1/94]

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. 055-00039

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Fuel-burning Equipment

- 2.9 The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gaseous fuel.

[IDAPA 58.01.01.676-677, 5/1/94]

Open Burning

- 2.10 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

[IDAPA 58.01.01.600-616, 5/1/94]

Air Stagnation Advisory Days

- 2.11 The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.550 through 562.

[IDAPA 58.01.01.550, 5/1/94]

Obligation to Comply

- 2.12 Receiving this permit shall not relieve the owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

[IDAPA 58.01.01.406, 5/1/94]

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. 055-00039

Permittee: Merritt Brothers Lumber Co.
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3. BOILER**3.1 Process Description**

The primary purpose of the Cleaver Brooks boiler is to generate steam for the lumber dry kilns.

3.2 Control Description

Boiler emissions from the combustion of natural gas are uncontrolled.

Emissions Limits**3.3 Emissions Limits**

Emissions of NO_x and CO from the boiler shall not exceed any corresponding emissions rate limits listed in the following table:

Table 3.1 BOILER EMISSIONS LIMITS

Source Description	NO _x		CO	
	lb/hr	T/yr	lb/hr	T/yr
Gas-Fired Boiler	2.93	12.8	2.46	10.8

[IDAPA 58.01.01.211.01, 5/1/94]

Operating Requirements**3.4 Boiler Fuel Specification**

The boiler shall burn only natural gas.

[IDAPA 58.01.01.211.01, 5/1/94]

Monitoring and Recordkeeping Requirements

There are no specific monitoring or recordkeeping requirements for the boiler.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. 055-00039

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4. DRYING KILNS

4.1 Process Description

The facility consists of three lumber drying kilns used to dry green lumber. The dry kilns are heated using non-contact steam coils, with steam being supplied by a natural gas boiler.

4.2 Control Description

Kiln emissions from the lumber drying process are uncontrolled.

Emission Limits

4.3 Emission Limits

Emissions from the drying kilns shall not exceed the following:

- PM – 14.9 T/yr;
- PM₁₀ – 8.6 T/yr;
- VOC – 67.5 T/yr.

[IDAPA 58.01.01.211.01, 5/1/94]

Operating Requirements

4.4 Maximum Facility Throughput

The maximum lumber throughput to the drying kilns shall not exceed 90 MMbf/yr board scale in any consecutive 12-month summation period.

[IDAPA 58.01.01.211.01, 1/94]

Monitoring and Recordkeeping Requirements

4.5 Lumber Throughput

The permittee shall monitor and record, on a monthly and annual basis, the lumber throughput to the drying kilns. The amounts shall be recorded as million board feet per year (MMbf/yr) based on board scale, to demonstrate compliance with Permit Condition 4.4. The annual amount shall be based on a rolling 12-month summation.

[IDAPA 58.01.01.211.01, 5/1/94]

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. 055-00039

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5. CYCLONES, PLANER CYCLONE BAGHOUSE AND TARGET BOX

5.1 Process Description

The facility consists of several lumber processing areas, including remanufacturing, planer mill and a finger-jointing mill. Wood residuals (chips, shavings and wood dust) generated from these process areas are transferred to 7 different cyclones where materials are separated from the air stream into two different truck bins.

5.2 Control Description

The planer shavings cyclone is followed by a baghouse in series. All other cyclones vent directly to the atmosphere.

Emission Limits

5.3 Emission Limits

PM and PM₁₀ emissions from the cyclones and baghouse shall not exceed the following:

PM – 22.7 T/yr
PM₁₀ – 13.8 T/yr

[IDAPA 58.01.01.211.01 and 405.01, 5/1/94]

Operating Requirements

5.4 Operating Hour Limits

The cyclones and baghouse shall not be operated more than 16 hours per day.

Monitoring and Recordkeeping

5.5 Monitor Hours of Operation

The permittee shall monitor and record the daily hours of operations of each cyclone and baghouse to demonstrate compliance with Permit Condition 5.4.

[IDAPA 58.01.01.211.01, 5/1/94]

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. 055-00039

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6. SUMMARY OF EMISSION LIMITS**MERRITT BROTHERS LUMBER COMPANY – ATHOL****Table 6.1 EMISSION LIMITS – HOURLY (lb/hr) AND ANNUAL (T/Yr)**

Source Description	PM		PM ₁₀		CO		NO _x		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Gas-fired Boiler					2.46	10.8	2.93	12.8		
Drying Kilns		14.9		8.6						67.5
Cyclones, Planer Cyclone Baghouse and Target Box		22.7		13.8						

Notes: Compliance determined by a pollutant-specific U.S. EPA reference method, Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

Compliance with annual limits determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

PM and PM₁₀ limits include condensibles.

7. FACILITY-WIDE EMISSIONS INVENTORY

The following table represents the potential to emit for criteria air pollutants at Merritt Brothers Lumber. This table is for informational purposes only.

Table 7.1 FACILITY EMISSION INVENTORY BASED ON PTE^{a,b}

SOURCE	PM ₁₀ ^c	SO ₂	CO	NO _x	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr
Gas-fired Boiler	1.0	0.1	10.8	12.8	0.7
Drying Kilns	8.6				67.5
Cyclones, Planer Cyclone Baghouse and Target Box	13.8				
Wood Handling Fugitives	0.4				
Total	23.8	0.1	10.8	12.8	68.2

^a As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

^b Compliance with annual limits determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^c PM and PM₁₀ limits include condensibles.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. 055-00039

Permittee: Merritt Brothers Lumber Co.
Location: Athol, Idaho

Date Issued: November 26, 2002
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8. GENERAL PROVISIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to be void.
8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.